

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Yoiner Perez-Perez

Case No. 5:25-MJ-146 (TWD)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of May 9, 2025 in the county of Cayuga in the Northern District of New York the defendant violated:

Code Section
Title 8, U.S.C., § 1326

Offense Description
Re-Entry of Deported Alien.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



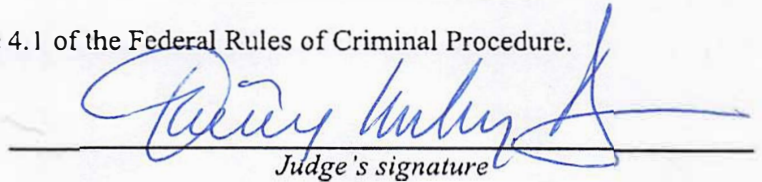
Complainant's signature

Randy Aponte, Border Patrol Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: May 12, 2025



Judge's signature

City and State: Syracuse, New York

Hon. Thérèse Wilcy Dancks, U.S. Magistrate Judge

Printed name and title

1. On May 9, 2025, at approximately 11:20 a.m., Oswego Station Border Patrol Agents ("BPA") were assigned to Auburn, New York, working targeting enforcement operations.
2. While conducting this operation, BPA assisted an officer of the Auburn Police Department on a traffic stop conducted on Lexington Avenue in the City of Auburn. The officer had initiated a traffic stop on a 2011 Honda Pilot bearing a New York license plate LFK3724 for Failure to Use a Turn Signal.
3. Agents conducted records checks and learned that the 2011 Honda Pilot was registered to Yoiner PEREZ-PEREZ (DOB: [REDACTED]). Further checks revealed that PEREZ-PEREZ was encountered by United States Customs Officers on three previous occasions in 2017, 2022, and 2024. Following his 2024 illegal entry, on April 24, 2024, PEREZ-PEREZ was ordered removed by an Immigration Judge. PEREZ-PEREZ was actually removed to Mexico through Brownsville, Texas on May 8, 2024.
4. BPA approached the 2011 Honda Pilot and identified themselves. BPA began speaking with driver PEREZ-PEREZ, who freely admitted to being a citizen and national of Mexico. PEREZ-PEREZ admitted that he did not have any immigration documents to remain in the United States legally and presented BPA with a New York State Driver's license and a Mexican voter card.
5. At the Oswego Border Patrol Station, records checks revealed that PEREZ-PEREZ is a Mexican citizen with no legal right to be in the United States.
6. PEREZ-PEREZ has never applied for or received permission from the Attorney General or the Secretary of the Department of Homeland Security to reenter the United States since his removal on or about May 8, 2024.